

FILED

FEB 09 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

MARIA CHRISTINA RODRIGUEZ,

Defendant

*
*
*
*
*
*
*
*

CRIMINAL NO.

W16CR037

INDICTMENT

[VIO: COUNT ONE, COUNT TWO and
COUNT THREE: 18 U.S.C. 641 – Theft of
Government Property; COUNT FOUR Food
Stamp Benefit Fraud: 7 U.S.C. § 2024(b)]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. 641]

Beginning in or about November, 2006, and continuing without interruption until in or about October, 2014, the exact dates unknown, in the Western District of Texas, the Defendant,

MARIA CHRISTINA RODRIGUEZ,

did knowingly embezzle, steal, purloin or knowingly convert to her use, property of the United States Department of Housing and Urban Development (HUD), a department or agency of the United States, and the value of such property in the aggregate amount exceeds \$1,000, in violation of Title 18, United States Code, Section 641.

COUNT TWO
[18 U.S.C. 641]

Beginning in or about November, 2006, and continuing without interruption until in or about October, 2014, the exact dates unknown, in the Western District of Texas, the Defendant,

MARIA CHRISTINA RODRIGUEZ,

did knowingly embezzle, steal, purloin or knowingly convert to her use, property of the United States Department of Agriculture (USDA), a department or agency of the United States, and the value of such property in the aggregate amount exceeds \$1,000, in violation of Title 18, United States Code, Section 641.

COUNT THREE
[18 U.S.C. 641]

Beginning in or about November, 2006, and continuing without interruption until in or about October, 2014, the exact dates unknown, in the Western District of Texas, the Defendant,

MARIA CHRISTINA RODRIGUEZ,

did knowingly steal or purloin a thing of value of the Social Security Administration, a department or agency of the United States, to-wit: Supplemental Social Security Income benefits, and the value of such property in the aggregate amount exceeds \$1,000, in violation of Title 18, United States Code, Section 641.

COUNT FOUR
[7 U.S.C § 2024(b)]

Beginning in or about November, 2006, and continuing without interruption until in or about October, 2014, the exact dates unknown, in the Western District of Texas, the Defendant,

MARIA CHRISTINA RODRIGUEZ,

did knowingly, use, transfer, acquire, alter and possess benefits of the Department of Agriculture Supplemental Food Stamp Program and its successor, the Nutrition Assistance Program (SNAP), a department and agency of the United States, based upon the submission of false and fraudulent information, and the nondisclosure of material facts, to wit: that MARIA CHRISTINA RODRIGUEZ failed to disclose her household composition and ownership of a business that

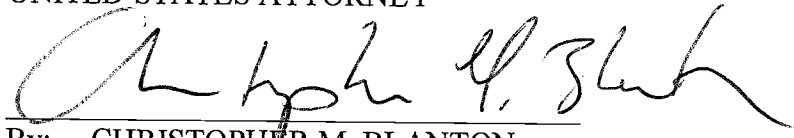
generated income during the entire time period, and as a result she obtained benefits from the Department of Agriculture Food Stamp Program and its successor, SNAP, to which the defendant knew she was not entitled, having a value in excess of \$5,000 all in n violation of 7 U.S.C § 2024(b).

A TRUE BILL:

SEALED DOCUMENT PURSUANT
TO E-GOVERNMENT ACT OF 2002

FOREPERSON

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY



By: CHRISTOPHER M. BLANTON
Assistant United States Attorney